

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA, CRIMINAL NO.

HON.

v.

VIO: 18 U.S.C. § 2251(a)

D-1 JOSHUA CHARSTON BROWN-HILL,

Defendant.

INFORMATION

The United States Attorney charges:

COUNT ONE

18 U.S.C. § 2251(a)

Sexual Exploitation of Children

From in or around April 2023 to in or around August 2024, in the Eastern District of Michigan, Southern Division, the defendant, JOSHUA CHARSTON BROWN-HILL, did employ, use, persuade, induce, entice, and coerce Minor Victim One (MV-1, a child born in 2012) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign

commerce by any means, including by computer; and knowing or having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; and the visual depiction was transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO
18 U.S.C. § 2251(a)
Sexual Exploitation of Children

From on or about April 19, 2024, to on or about June 12, 2024, in the Eastern District of Michigan, Southern Division, the defendant, JOSHUA CHARSTON BROWN-HILL, did employ, use, persuade, induce, entice, and coerce Minor Victim Two (MV-2, a child born in 2010) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and knowing or having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; and the visual depiction was transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a).

COUNT THREE
18 U.S.C. § 2251(a)
Sexual Exploitation of Children

From on or about April 10, 2023, to on or about May 8, 2023, in the Eastern District of Michigan, Southern Division, the defendant, JOSHUA CHARSTON BROWN-HILL, did employ, use, persuade, induce, entice, and coerce Minor Victim Four (MV-4, a child born in 2009) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and knowing or having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; and the visual depiction was transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a).

FORFEITURE ALLEGATIONS

18 U.S.C. § 2253

Criminal Forfeiture

The allegations contained in this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Upon conviction of one or more of the offenses charged in the Information, defendant shall, pursuant to Title 18, United States Code, Section 2253, forfeit to the United States the following:

- a) Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, or 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- b) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c) Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property subject to forfeiture pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant--

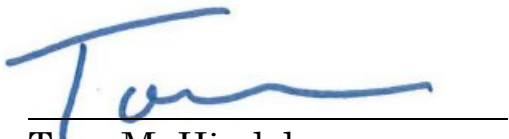
- a) cannot be located upon the exercise of due diligence;
- b) has been transferred to, sold to, or deposited with a third party;

- c) has been placed beyond the jurisdiction of this Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty;

the United States of America, intends to seek forfeiture of all other property of the defendant up to the value of forfeiture applicable in this case.

JEROME F. GORGON JR.
United States Attorney

Sara D. Woodward
Chief, General Crimes Unit
Assistant United States Attorney



Tara M. Hindelang
Assistant United States Attorney
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Date: June 13, 2025

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. Joshua Charston Brown-Hill

County where offense occurred : Oakland and elsewhere

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 24-mj-30465]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 13, 2025
Date

s/ Tara Hindelang
 Tara Hindelang
 Assistant United States Attorney
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 Attorney Bar #: P78685

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.